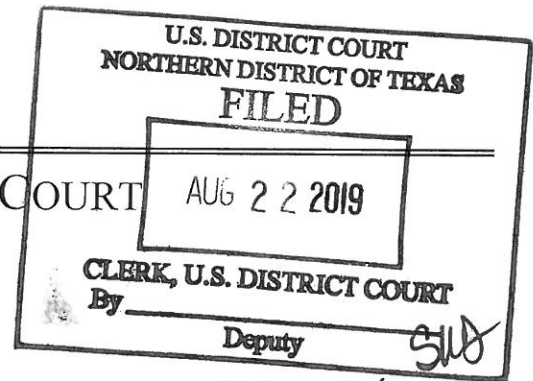


SEALED



UNITED STATES DISTRICT COURT

for the

Northern District of Texas

United States of America

v.

Opeyemi Abidemi Adeoso

and

Benjamin Adeleke Ifebajo

Defendant(s)

Case No. 3:19-MJ-737-BN

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 1, 2015 to present in the county of Dallas in the
Northern District of Texas and elsewhere, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 1343	Wire Fraud
18 U.S.C. § 1344	Bank Fraud
18 U.S.C. §§ 1343, 1344, and 1349	Conspiracy to Commit Wire Fraud and Bank Fraud
18 U.S.C. §§ 1956 and 1957	Money Laundering

This criminal complaint is based on these facts:

See attached affidavit

☒ Continued on the attached sheet.

Complainant's signature

Special Agent Thomas R. Cook, FBI

Printed name and title

Sworn to before me and signed in my presence.

Date: 08/22/2019City and state: Dallas, Texas

Judge's signature

DAVID L. HORAN, U.S. MAGISTRATE JUDGE

Printed name and title

AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR COMPLAINT

I, Thomas R. Cook, being duly sworn, hereby depose and state as follows:

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI"), currently assigned to the Dallas Division, duly appointed and acting according to law. I have been a Special Agent since August 2014. Prior to becoming a Special Agent, I worked for two and a half years as an intelligence analyst for the FBI on counterterrorism investigations. I am currently assigned to the Cyber Task Force of the Dallas Division and am responsible for conducting investigations of cyber intrusions, business email compromise, and cyber enabled criminal actors. I have received training in such areas as electronic and physical surveillance, interviewing witnesses and defendants, financial analysis, collection of evidence, and the use of confidential informants. I have also received training regarding computers and digital evidence.

2. The facts in this affidavit come from my personal observations, my training and experience, information obtained from other agents and witnesses, and my review of records. This affidavit is intended to show merely that there is sufficient probable cause for the requested criminal complaint and warrant and does not set forth all of my knowledge about this matter.

3. This affidavit sets forth facts and suggests reasonable inferences from those facts establishing that there is probable cause to believe that between at least on or about June 1, 2015, and August 22, 2019, **Opeyemi Abidemi Adeoso ("Adeoso")** and **Benjamin Adeleke Ifebajo ("Ifebajo")** knowingly and intentionally combined,

conspired, confederated and agreed with other persons, known and unknown to commit Wire Fraud, Bank Fraud, Conspiracy, and Money Laundering, in violation of 18 U.S.C. §§ 1343, 1344, 1349, 1956, and 1957.

4. In or about August 2018, agents from the FBI initiated a computer intrusion investigation regarding allegations and complaints of a business email compromise (“BEC”) scheme with the fraudulent proceeds being accessed by individuals in the Dallas-Fort Worth area (“DFW”). The investigation revealed that in or about February 2018, Victim 1, an identified business, sent multiple wires totaling approximately \$504,660.52 to a Dallas based bank account. Further, in or about March 2018, Victim 2, an identified Dallas area business, sent a wire totaling \$179,223.33 to another Dallas based bank account.

5. Adeoso and Ifebajo first came to the attention of FBI Dallas as a result of investigative activity following Victim 1’s transfers totaling approximately \$504,660.52 to fraudulent accounts. During the course of the investigation it was learned that the Victims’ funds were disbursed by the alias identity, Daniel Sammy Campbell (“Campbell”), with an address of 9451 Wickersham Road, Apt 2075, Dallas, Texas. The investigation revealed Adeoso was the resident of 9451 Wickersham Road, Apt 2075 at the same time as alias name Campbell. During the course of the investigation, it was learned that Adeoso was no longer a resident and gave a forwarding address of 6808 Skillman Street, Dallas, Texas. The apartment manager at 6808 Skillman Street recognized Adeoso’s photograph and confirmed Adeoso’s name was on the lease for Apartment 6104. Adeoso’s lease stated that his friend, Ifebajo, referred him to the

apartments at 6808 Skillman Street.

6. During the course of this investigation, records for numerous bank accounts used during the course of the scheme have been obtained and reviewed. A review of many of the bank accounts indicated a similar pattern of behavior. That is, the accounts were set up in alias names, utilizing fraudulent foreign government passports, fraudulent utility bills, and incorporation documents from the Dallas County Clerk's Office.

Additionally, none of the businesses appeared to have a significant presence in the DFW area, in that the companies appear to have been recently formed and/or have no internet presence, and the individuals did not have a significant identifiable address or financial history. Shortly after the accounts were opened, the accounts either received BEC wire proceeds or they received cashier's checks from other accounts that had received the BEC wire proceeds. A review of the bank records reveals a pattern of large inflows immediately followed by outflows via cash, cashier's check, and occasionally wire transfer.

7. Based on the individual's pattern of behavior, the tracing of funds, review of bank surveillance footage, and contact with some of the financial institutions, FBI Dallas identified Ifebajo and Adeoso as two of the primary suspects who were often involved in withdrawing BEC money from Dallas area financial institutions. Ifebajo is believed to have utilized numerous aliases including, but not limited to, Joseph Eric Johnson, Jeremiah Alex Malcolm, Tidwell Anthony Wilson, and Andrew James Williams. Adeoso is believed to have utilized aliases including, but not limited to, Peter Kuffor, George Macharty, Nelson Johnson, Braheem Larke, Michael Albert, Michael

Jaden Sean, Michael Jeff Brown, and Benjamin Zee Brown. Both Ifebajo and Adeoso have utilized fraudulent foreign passports to support these alias identities as well as to open multiple bank accounts in the DFW area.

Opeyemi Adeoso

8. During the course of the investigation, immigration records were obtained for Adeoso. According to the records, Adeoso submitted an application for a Non-Immigrant Visa on or about June 27, 2014, and again on or about August 4, 2014. The consular notes indicate Adeoso planned to visit his father's grave in New York during his trip to the United States. Adeoso was granted his visa on September 6, 2014, and entered the United States on October 19, 2014. Adeoso's wife at the time, Bukola Comfort Adeoso ("Bukola") was also granted a visa on September 6, 2014, but did not enter the United States until May 30, 2015. Notably, Adeoso's marriage was dissolved in Lagos, Nigeria, on October 10, 2014, nine days before he entered the United States, according to paperwork he provided to United States Citizenship and Immigration Services.

9. Although, Adeoso was married with children at the time of his application for a Non-Immigrant visa, he married United States' citizen Cherria Davis ("Davis") on April 17, 2015. Thereafter, Davis petitioned for Adeoso's permanent status. Shortly after Bukola arrived in the United States, she moved to Dallas, Texas. A review of cash withdrawals from Adeoso's bank accounts in his name as well and his alias accounts, reveals multiple instances of large cash withdrawals by Adeoso with matching cash deposits into Bukola's accounts. For example, on December 23, 2015, Adeoso withdrew \$9,500, and Bukola deposited \$9,500 that same day; on January 4, 2016, Adeoso

withdrew \$5,000 and the next day Bukola deposited \$5,000; and, on February 24, 2016, Adeoso withdrew \$7,000 and the same day Bukola deposited \$7,000.

10. Thus far the investigation has revealed that Adeoso began opening bank accounts in fraudulent names as early as June 2015.

Alias Bank Accounts¹

Alias Name: Peter Kuffor

11. Adeoso opened bank accounts at Branch Banking & Trust (“BB&T”) on BB&T on June 9, 2015, Capital One on June 24, 2015, Wells Fargo on June 24, 2015, BBVA² on July 3, 2015, Bank of America on July 30, 2015, First Convenience Bank on November 9, 2015, and Chase Bank on November 24, 2015, utilizing the alias Peter Kuffor (“Kuffor”). Adeoso presented a fraudulent passport from Great Britain bearing number G0480005, listed his addresses as either 11991 Audelia Rd Apt 1304 or 6246 Ridgecrest Rd, Apartment 1440, 1441, and 1443, and on some occasions provided email address flavorj1@yahoo.com on the bank accounts’ opening documentation. Adeoso was photographed when he opened the account at First Convenience Bank on November 9, 2015. For all of the accounts, Adeoso either opened the accounts or conducted transactions at banking locations in Dallas, Texas.

¹This section outlines various bank accounts that have been identified during the course of the investigation as having been opened and used to facilitate the scheme.

²Formerly known as BBVA Compass.

Alias Name: George Macharty

12. Adeoso opened bank accounts at Wells Fargo on September 3, 2015, Bank of America on September 8, 2015, First Convenience Bank on October 5, 2015, BBVA on October 7, 2015, Capital One on October 6, 2015, Chase Bank on October 28, 2015, and BB&T on November 24, 2015, utilizing the alias George Macharty (“Macharty”). Adeoso presented a fraudulent passport from Nigeria bearing number A02291658 to open the accounts. BBVA made a photocopy of the passport, which included a fraudulent United States visa with a fraudulent entry stamp purporting to show entry in Atlanta, Georgia on June 3, 2015. Adeoso listed his United States address as 6244 Ridgecrest Rd, Apt 1441 and provided email address flavorj1@yahoo.com in the account opening documentation for three of the bank accounts. For all of the accounts, Adeoso either opened the accounts or conducted transactions at banking locations in Dallas, Texas.

Alias Name: Johnson Nelson

13. Adeoso opened bank accounts at Bank of America on October 20, 2015, Capital One on October 21, 2015, BB&T on October 22, 2015, and Woodforest Bank on January 6, 2016, utilizing the alias Johnson Nelson (“Nelson”). Adeoso presented a fraudulent foreign passport from Nigeria bearing number A01044887 and listed his address 6244 Ridgecrest Rd, Apt 1441. Adeoso listed his email address on the Bank of America application as flavorj1@yahoo.com, but at Woodforest Adeoso listed his email address as justonceacademy@gmail.com, the same email address listed on his Non-Immigrant Visa application. With the exception of Woodforest Bank, Adeoso either opened the accounts or conducted transactions at banking locations in Dallas, Texas.

Alias Name: Braheem Larke

14. Adeoso opened bank accounts at Woodforest on November 12, 2015, BB&T on November 13, 2015, Bank of America on November 13, 2015, Wells Fargo on November 19, 2015, and Capital One on November 23, 2015, utilizing the alias Braheem Larke "Larke"). Adeoso presented a fraudulent passport from Ghana bearing number G0268266, and listed his address as 6244 Ridgcrest Rd Apt 1440 and 1441. Adeoso listed his email address with on the Bank of America application as justonceacademy@gmail.com and at Woodforest as flavorjl@yahoo.com. With the exception of BB&T and Woodforest Bank, Adeoso either opened the accounts or conducted transactions at banking locations in Dallas, Texas.

Alias Name: Michael Albert

15. Adeoso opened bank accounts at Wells Fargo on February 2, 2016, First Convenience Bank on February 4, 2016, Chase Bank on February 5, 2016, City Bank of Texas on February 11, 2016, and Capital One on February 11, 2016, utilizing the alias Michael Albert ("Albert"). Adeoso presented a fraudulent passport from Nigeria bearing number A00067805 to open the accounts. City Bank of Texas made a photocopy of the passport which included a fraudulent United States visa, control number 20152241270008 with a fraudulent entry stamp purporting to show entry to Atlanta, Georgia on June 11, 2015. Adeoso listed his email address on the Chase Bank application as justonceacademy@gmail.com. For all of the accounts, Adeoso either opened the accounts or conducted transactions at banking locations in Dallas, Texas.

BEC Wire Proceeds into Adeoso's 2015 and 2016 Alias Accounts

16. Thus far, the investigation has shown that between in or about July 2015, and March 2016, Adeoso utilized these five alias names to receive at least approximately \$423,285 in wire fraud proceeds from victim companies throughout the United States. According to the investigation thus far, it appears that each of the victims received a spoofed email instructing them to wire funds to Adeoso's accounts. After each wire transfer, the funds were subsequently withdrawn from the account via cashier's checks or cash withdrawals. Funds were often then commingled into Adeoso's other accounts. Additionally, bank records reveal wire transfers and Moneygrams back to Nigeria.

17. The below chart lays out the date of the wire transfer, the bank account, the alias name used, the amount of the wire, and a masked version of the victim company. This chart only includes wires sent to Adeoso's accounts. The chart does not include spoofed emails that requested additional funds, it does not include unsuccessful spoofed emails that did not result in a wire transfer, nor does it detail Adeoso commingling and laundering of other BEC frauds. Some of the funds were recovered by the victim companies, but many of the victims suffered a total loss. Thus far, the investigation has identified nineteen victims with losses.

#	Date	Bank	Alias	Amount	Victim Masked ³
1	7/31/2015	BBVA	Kuffor	\$18,500	BBI
2	8/11/2015	BBT	Kuffor	\$15,950	CC
3	9/23/2015	BOFA	Macharty	\$14,500	UPT
4	9/28/2015	WF	Macharty	\$14,500	NDS
5	10/13/2015	CapOne	Macharty	\$14,500	GWLS
6	11/3/2015	BBT	Johnson	\$14,950	QL
7	11/5/2015	CapOne	Johnson	\$19,850	PA
8	11/6/2015	BOFA	Johnson	\$19,850	C
9	11/16/2015	JPMC	Macharty	\$19,850	SPKC
10	11/23/2015	Wood	Larke	\$14,850	HSP
11	11/24/2015	BBT	Larke	\$14,850	ASC
12	11/25/2015	BOFA	Larke	\$14,850	NM
13	12/18/2015	BBT	Macharty	\$19,850	ACDTC
14	12/18/2015	CapOne	Larke	\$19,850	CTC
15	12/23/2015	JPMC	Macharty	\$39,850	GPI
16	2/16/2016	JPMC	Albert	\$19,350	CCH
17	2/18/2019	JPMC	Albert	\$39,450	CCH
18	3/11/2016	BOFA	Albert	\$9,600	LAS
19	3/11/2016	CBoT	Albert	\$9,600	MM
20	3/11/2016	CapOne	Albert	\$9,600	NP
21	3/14/2016	CapOne	Albert	\$19,450	NP
22	3/15/2016	WF	Albert	\$39,685	NP
Total				\$423,285	19 Victims

BEC Wire Proceeds into Adeoso's 2018 and 2019 Alias Accounts

18. Between January 2018 and June 2019, Adeoso utilized at least three additional alias names to receive at least \$577,520.30 in wire fraud proceeds from victim companies throughout the United States. Adeoso also utilized his alias names and bank accounts to launder the proceeds of other BEC frauds by depositing cashier's checks and then subsequently withdrawing cash or further laundering the proceeds.

³I know the name of the victim entity; however, in order to protect the victim entities information, their names are not being included in this affidavit.

Alias Name: Michael Jeff Brown

19. Adeoso opened bank accounts at BBVA on January 3, 2018, and Bank of America on January 31, 2018, utilizing the alias Michael Jeff Brown (“M. Brown”) and business name Pathfinder Global Ventures. Adeoso presented a fraudulent passport from Great Britain bearing number 587423962 and Bank of America scanned a copy of the passport to its files. Adeoso listed his address at BBVA as 9850 Whitehurst Drive, Apt 1009 and also provided business incorporation paperwork from Dallas County and IRS tax employer ID number of 82-3093571. For both accounts, Adeoso either opened the accounts or conducted transactions at banking locations in Dallas, Texas.

Alias Name: Michael Jaden Sean

20. Adeoso opened bank accounts at BBVA on May 11, 2018, Bank of America on May 30, 2018, and Wells Fargo on July 24, 2018, utilizing the alias Michael Jaden Sean (“Sean”) and business name Reality Retails and Equipment. At all three banks, Adeoso presented a fraudulent passport from Great Britain bearing number 591189762. At Bank of America he also presented his debit card from BBVA, and at Wells Fargo he presented a debit card from Chase Bank. For all of the accounts, Adeoso either opened the accounts or conducted transactions at banking locations in Dallas, Texas.

Alias Name: Benjamin Zee Brown

21. Adeoso opened bank accounts at Chase Bank on October 17, 2018, Wells Fargo on March 1, 2019, and at Bank of America on May 17, 2019, utilizing the alias Benjamin Zee Brown (“B. Brown”) and the business name Reality Ventures and

Logistics. At Wells Fargo, Adeoso presented a fraudulent passport from Great Britain bearing number 812548790, as well as business incorporation documents from Dallas County, IRS Tax Employer ID 83-2507944, and a debit card from Chase Bank. At Bank of America, Adeoso utilized the same IRS Tax Employer ID. For all of the accounts, Adeoso either opened the accounts or conducted transactions at banking locations in Dallas, Texas.

22. Between February 2018 and May 2019, Adeoso utilized accounts he opened in the three aliases, M. Brown, Sean, and B. Brown, names to receive at least approximately \$577,520.30 in wire fraud proceeds from victim entities throughout the United States. The below chart identifies the date of the wire transfer, the bank account, the alias name used, the amount of the wire, and a masked version of the victim company. After each wire transfer, the funds were subsequently withdrawn from the account via cashier's checks or cash withdrawals. Funds were often commingled into Adeoso's other accounts.

#	Date	Bank	Alias	Amount	Victim Masked
1	2/15/2018	BOFA	M. Brown	\$22,630	QAS
2	4/16/2018	BBVA	M. Brown	\$121,176	CSF
3	4/30/2018	BBVA	M. Brown	\$433,714.31 ^{*4}	CSF
4	6/5/2018	BBVA	Sean	\$6,488	MI
5	8/22/2018	WF	Sean	\$51,000	VME
6	5/7/2019	WF	B. Brown	\$33,618	RTE
Total				\$ 577,520.30	5 Victims

⁴ This wire was reversed by BBVA shortly after the funds entered M. Brown's account.

23. The below chart depicts the laundering of BEC fraud proceeds from other individuals both known and unknown. The chart lays out the date of the deposit, the bank, the alias used, the amount of cashier's check, the source of the cashier's check if known, the source's bank, and the victim if known. Adeoso has deposited at least approximately \$621,393.77 between June 2018 and June 2019.

#	Date	Bank	Alias	Amount	Source Bank	Remitter is a Known Alias	Victim Masked
1	6/15/2018	BOFA	Sean	\$98,000	Chase	No	BH
2	7/30/2018	WF	Sean	\$25,888	Chase	No	X
3	11/20/2018	Chase	B. Brown	\$71,230	SunTrust	No	X
4	12/5/2018	Chase	B. Brown	\$4,000	BBT	Yes	X
5	12/10/2018	Chase	B. Brown	\$43,480	BBVA	Yes	X
6	4/12/2019	BOFA	B. Brown	\$28,900	Regions	No	X
7	4/12/2019	WF	B. Brown	\$70,000	Cap One	No	X
8	4/25/2019	WF	B. Brown	\$97,520	Chase	Yes	FFC
9	5/8/2019	WF	B. Brown	\$25,000	Chase	Yes	X
10	5/9/2019	WF	B. Brown	\$19,500	BOFA	No	X
11	5/13/2019	BOFA	B. Brown	\$43,200	Chase	No	X
12	5/30/2019	WF	B. Brown	\$17,300	BOFA	No	X
13	5/30/2019	WF	B. Brown	\$51,625	BOFA	No	X
14	6/14/2019	WF	B. Brown	\$25,750	Chase	No	X
Total				\$621,393.77			

Benjamin Ifebajo

24. During the course of the investigation, immigration records were obtained for Ifebajo. According to the records, Ifebajo submitted an application for a Non-Immigrant Visa on or about July 3, 2015, and the consular notes indicate Ifebajo planned to attend a wedding in Texas for seven days. Ifebajo listed his point of contact as Cherria Davis, and listed his email address as benvicschools@gmail.com. As referenced above,

Cherria Davis married Adeoso on April 17, 2015. Ifebajo was granted his visa on or about August 25, 2015, and entered the United States on or about October 18, 2015.

25. On November 24, 2015, United States Customs and Border Patrol (“CBP”) seized a DHL package containing two fraudulent passports in an alias names Chris Hammington and James Alexander. The passports had fraudulent visa numbers and admission entry stamps that CBP deemed to be counterfeit. The fraudulent documents were intended for Ifebajo's then residence at 11911 Audelia Road, Dallas, Texas, which was the same address Ifebajo listed in his Non-Immigrant Visa Application.

Alias Bank Accounts

Jeremiah Alex Malcolm

26. Ifebajo opened bank accounts at Chase Bank on November 20, 2017, Wells Fargo on November 21, 2017, and BB&T on November 22, 2017, utilizing the alias Jeremiah Alex Malcolm (“Malcolm”) and the business name Breakthrough Auto Links. Ifebajo utilized a fraudulent passport from Great Britain bearing number 597632148 to open the account. BB&T surveillance photographs from inside the bank and the ATM show Ifebajo engaged in banking transactions under the alias Malcolm. For all of the accounts, Ifebajo either opened the accounts or conducted transactions at banking locations in Dallas, Texas.

Andrew James Williams

27. Ifebajo opened bank accounts at Bank of America on May 30, 2018, Wells Fargo on June 13, 2018, and BBVA on June 13, 2018, utilizing the alias Andrew James Williams (“Williams”) and business name Williams Retails and Equipments [sic]. Ifebajo

utilized a fraudulent passport from Great Britain bearing number 506108928 to open the account. When the BBVA account was opened BBVA personnel scanned a copy of the fraudulent passport Ifebajo utilized to open the account. With the exception of BBVA, Ifebajo either opened the accounts or conducted transactions at banking locations in Dallas, Texas.

Joseph Eric Johnson

28. Ifebajo opened bank accounts at Chase Bank on October 25, 2018, BB&T on October 26, 2018, BBVA on November 15, 2018, and Wells Fargo Bank on November 26, 2018, utilizing the alias Joseph Eric Johnson (“Johnson”) and business name Reality Global Equipments [sic]. Ifebajo utilized a fraudulent Namibian passport bearing number P625190, business incorporation documents from Dallas County, and an IRS Tax Employer ID 83-2508382 to open the account. When the BBVA account was opened, BBVA personnel scanned a copy of the fraudulent Namibian passport Ifebajo used to open the account. Further, Chase, BB&T, and Wells Fargo all have surveillance video and/or still images showing Ifebajo engaging in banking transactions under the alias Johnson. On the accounts’ opening documentation, Ifebajo listed the address 3931 Leeds Ct, Garland, Texas, which was shared with two females who were also believed to be engaging in BEC fraud schemes and sending money to Ifebajo. For all of the accounts, Ifebajo either opened the accounts or conducted transactions at banking locations in Dallas, Texas.

Tidwell Anthony Wilson

29. Ifebajo opened bank accounts at Bank of America on January 8, 2019, Capital One on January 30, 2019, Chase Bank on January 30, 2019, and BBVA on February 7, 2019, utilizing the alias Tidwell Anthony Wilson (“Wilson”) and business name WillyTidy Venture and Service. Ifebajo presented a fraudulent passport from Sierra Leone bearing number ER412575 to open the account. Capital One has surveillance video from their ATM and inside the bank that show Ifebajo engaged in the banking transactions under the alias Wilson. With the exception of BBVA, Ifebajo either opened the accounts or conducted transactions at banking locations in Dallas, Texas.

BEC Wire Proceeds into Ifebajo’s Alias Accounts

30. Between February 2018 and January 2019, Ifebajo utilized accounts he opened in the aliases, Williams, Johnson, and Wilson, names to receive at least \$1,227,817 in wire fraud proceeds from victim entities throughout the United States. According to complaints and victim interviews, the victims received a spoofed email from someone pretending to be from their company and directing them to wire funds to Ifebajo’s accounts. The below chart identifies the date of the wire transfer, the bank account, the alias name used, the amount of the wire, and a masked version of the victim company. After each wire transfer, the funds were subsequently withdrawn from the account via cashier’s checks or cash withdrawals. Funds were often commingled into Ifebajo’s other accounts.

#	Date	Bank	Alias	Amount	Victim Masked
1	2/5/2018	Chase	Malcolm	\$39,710	TJH
2	2/8/2018	BBT	Malcolm	\$39,150	RFG
3	2/13/2018	BBT	Malcolm	\$49,620	RFG
4	2/20/2018	BBT	Malcolm	\$96,740	RFG
5	2/23/2018	BBT	Malcolm	\$316,200	RFG
6	6/15/2018	BOFA	Williams	\$27,980	JFT
7	8/13/2018	WF	Williams	\$48,880	CT
8	12/19/2018	BBVA	Johnson	\$100,000	JT
9	1/4/2019	BBVA	Williams	\$509,536	MC
Total				\$1,227,816	6 Victims

31. Ifebajo also utilized his alias bank accounts to launder the proceeds of other BEC fraud schemes. Between January 2018 and February 2019, Ifebajo deposited a total of approximately \$593,577.31, typically in the form of cashier's checks, into bank accounts he controlled. The below chart identifies the date of the wire transfer, the bank account, the alias name used, the amount of the wire, and a masked version of the victim company.

#	Date	Bank	Alias	Amount	Source Bank	Remitter is a Known Alias	Victim Masked
1	1/31/2018	WF	Malcolm	\$36,800.00	Chase	Yes	X
2	2/21/2018	WF	Malcolm	\$42,500.00	Chase	No	CE
3	2/21/2018	WF	Malcolm	\$35,200.00	BBT	Yes	RFG
4	2/26/2018	WF	Malcolm	\$79,700.82	BBT	Yes	RFG
5	3/5/2018	WF	Malcolm	\$58,800.00	Chase	No	CS
6	11/7/2018	Chase	Johnson	\$19,850.00	WF	No	X
7	11/23/2018	Chase	Johnson	\$38,480.05	Chase	Yes	X
8	11/26/2018	WF	Wilson	\$90,000.00	Bank of the West	No	X
9	12/8/2018	Chase	Johnson	\$58,885.00	BBVA	No	TMS
10	12/19/2018	BBVA	Johnson	\$24,860.05	Chase	Yes	GC
11	1/14/2019	BOFA	Wilson	\$8,045.88	WF	No	X
12	2/4/2019	WF	Johnson	\$65,200.00	Chase	Yes	X
13	2/15/2019	CapOne	Wilson	\$35,255.51	Chase	No	X
TOTAL				\$593,577.31	5 Known Victims		

32. Based on the review of bank records, the tracing of funds, a review of email communications, and another analysis, your affiant believes that Adeoso and Ifebajo may be utilizing and/or controlling additional aliases and business names. That is, your affiant believes that Adeoso and Ifebajo are potentially utilizing, controlling, or coordinating with the following additional aliases and/or individuals: Ruben Scott, Scott Solomon, Anthony Anderson dba Anderson Auto, Peter Marcharty dba West Cool Global Ventures, Michele Angel Cole, Deborah Kiki Philip, Christiana Andrea Johnson, Eric Steven Moore, James Louis Hamilton, Isaac John Fortune dba Galaxy Links Ventures, Malcolm John Tayloy, Peter Darko, Andrew Mpho James, Mary A Adams, Michael R Campbell, Matthew Osborne, Anthony S Turner, and Daniel Campbell dba Brainstorm Global Links.

Assets to be Seized⁵

33. Adeoso and Ifebajo have opened bank accounts at various bank branches throughout the Dallas-Fort Worth metroplex. In order to travel to the various bank branches, both Ifebajo and Adeoso have driven to the banks. In addition, FBI surveillance has observed Ifebajo park approximately 500 yards from a target bank and walk to the bank, presumably to avoid his vehicle showing up on bank surveillance footage. Ifebajo and Adeoso have also been seen walking up to drive-thru ATMs to withdraw cash or make deposits. In another attempt to disguise their identities, Adeoso and Ifebajo

⁵ Via separate affidavit, I will submit seizure warrant applications seeking to seize assets, specifically two motor vehicles (2015 Chevrolet Camaro; 2011 Mercedes Benz E350) that Adeoso and has utilized to facilitate this fraudulent scheme.

frequently employ temporary paper "dealer tags" to avoid detection. These dealer tags are often registered in fictional names to obscure the connection back to Adeoso and Ifebajo.

34. Further, Adeoso and Ifebajo have created companies which allegedly deal in the buying and selling of cars. Adeoso's company, Just Once Auto Global Ventures, is located at 9550 Forest Lane, Suite 332, Dallas, Texas. Ifebajo's company, Benvic Auto Ventures, is located in the same building, 9550 Forest Lane, Suite 339, Dallas, Texas. On some occasions, Adeoso and Ifebajo have used their 9550 Forest Lane address as the address for their alias identities. For example, Benvic Auto Global Ventures and Willy Tiddy Retail both have addresses at 9550 Forest Lane.

35. Via separate affidavit, I will submit search warrant applications seeking to search three locations and a storage unit, that is, 6808 Skillman Street, Apartment 6104, Dallas, Texas and Storage Unit S604, 430 East Buckingham Road, Apartment 321, Richardson, Texas, and 9550 Forest Lane Suite 332 and 339, that I have probable cause to believe contains evidence of the offenses described in this affidavit and/or contraband.

36. Further, via separate affidavit, I will submit applications for search warrants to search additional email accounts utilized during the course of this scheme. Thus far in the investigation, search warrants have been obtained by the District of North Dakota, and results of those have been provided to the FBI Dallas. A review of the records obtained revealed numerous email contacts between Adeoso's email account and two suspected alias names, Ruben Scott ("Scott") and Ray Meek ("Meek").

37. The typical communication pattern was Adeoso emailed Scott or Meek with the details of bank accounts created in the DFW area. Often, Ifebajo emailed Adeoso with details on bank accounts, and then Adeoso forwarded the information to Scott or Meek. On multiple occasions, Scott or Meek responded with the names of victims of the BEC fraud schemes. A review of the emails revealed at least 50 banks accounts that were previously unknown to investigators and appeared to be controlled or utilized by Adeoso and Ifebajo.

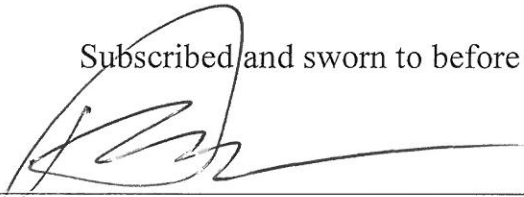
38. Based upon the aforementioned information, I have probable cause to believe that between on or about June 1, 2015, and August 22, 2019, **Opeyemi Adeoso** and **Benjamin Ifebajo** and others known and unknown, knowingly and intentionally combined, conspired, confederated and agreed with other persons, known and unknown to commit Wire Fraud, Bank Fraud, Conspiracy, and Money Laundering, in violation of 18 U.S.C. §§ 1343, 1344, 1349, 1956, and 1957, in the Northern District of Texas and elsewhere. Although the investigation remains ongoing and additional bank records have yet to be analyzed, between on or about June 1, 2015, and August 23, 2019, Adeoso and

Ifebajo have collectively received and laundered BEC wire fraud proceeds in excess of \$3,443,592.38. Therefore, I respectfully submit this affidavit in support of a criminal complaint and request a warrant be issued for the arrest of **Opeyemi Adeoso and Benjamin Ifebajo.**



THOMAS R. COOK
Special Agent
Federal Bureau of Investigation

Subscribed and sworn to before me on the 22nd day of August, 2019



DAVID L. HORAN
United States Magistrate Judge
Northern District of Texas
Dallas Division